

---

---

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

---

---

JOSEPH LOWRY,  
  
*Plaintiff(s),*

v.

CITY OF LA MARQUE, TEXAS, et  
al.,

*Defendant(s).*

§  
§  
§  
§  
§  
§  
§  
§  
§

No. 3:22-cv-00112

Jury

**PLAINTIFF JOSEPH LOWRY'S  
SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME**

For the reasons explained below, Plaintiff Joseph Lowry (referred to as “Lowry”) requests that the Court extend the time to file his response in opposition to Defendant City of La Marque, Texas’ (referred to as “La Marque”) Motion to Dismiss (Doc. 17) until March 15, 2023. *See*, Fed. R. Civ. P. 6(b).

**I**

The deadline for Lowry to respond to La Marque’s Motion to Dismiss (Doc. 17) is March 10, 2023.

## II

Lowry requests an extension of time of five (5) days, to March 15, 2023, to respond to La Marque's Motion to Dismiss (Doc. 17); this is Lowry's second request for extension of time.

## III

Good cause exists for the requested extension because Lowry's lawyer has an unplanned personal conflict that makes finalizing the motion by the deadline not possible.

## IV

The undersigned has conferred with opposing counsel, who indicated that this request is not opposed.

\* \* \*

For the foregoing reasons, Lowry requests that the Court extend the time to respond to La Marque's Motion to Dismiss (Doc. 17) to March 15, 2023.

Respectfully Submitted,

MOORE & ASSOCIATES


Lyric Centre

440 Louisiana Street | Suite 1110

Houston, Texas 77002-1055

Telephone: (713) 222-6775

Facsimile: (713) 222-6739

By: 

Curt Hesse

Tex. Bar No. 24065414

curt@mooreandassociates.net

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

As required by Fed. R. Civ. P. 26(c)(1), 37(a)(1) and/or the local rules, I certify that I have conferred or made a reasonable attempt to confer with all other parties or their attorney(s) of record, who are listed below, about the merits of this motion with the following results:

Mr. Steve Selbe

GORDON REESE SCULLY MANSUKHANI

*Attorney(s) for Defendant City of La Marque, Texas*

☐

opposes the motion

☒

does not oppose the motion

☐

agrees with the motion

☐

would not say whether the motion is opposed

☐

did not return my messages regarding the motion

March 10, 2023

Date



Curt Hesse

CERTIFICATE OF SERVICE

As required by Fed. R. Civ. P. 5(a)(1), I certify that I served a copy of this document on all parties or their attorney(s) of record—who are listed below—in accordance with Fed. R. Civ. P. 5(b) on the date indicated as follows:

Mr. Steve Selbe

sselbe@grsm.com

GORDON REESE SCULLY MANSUKHANI

1900 West Loop South, Suite 1000

Houston, Texas 77027

Facsimile: (123) 456-7890

*Attorney(s) for Defendant City of La Marque, Texas*

☐

mail

☐

personal delivery

☐

leaving it at ☐ office ☐ dwelling

☐

leaving it with court clerk

☐

electronic means

☐

other means

☒

CM/ECF system

March 10, 2023

Date



Curt Hesse